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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In re Application of

Educational Media Foundation

For a Minor Change to a Licensed Facility
KAHI(FM), Wahiawa, Hawaii

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BPED-20070525AHV
Fac. ID No. 164206

FILED/ACCEPTED

SEP 11 2007

Federal Communications Commission
Office of the Secretary

To: Office of the Secretary
Attn: Audio Division, Media Bureau

RESPONSE

Visionary Related Entertainment, LLC ("Visionary"), licensee of Stations KSHK(FM), Kekaha, Hawaii, and KNUQ(FM), Paauilo, Hawaii, by its counsel, hereby responds to the "Reply to Response to Order to Show Cause" filed by Educational Media Foundation ("EMF") on August 23, 2007.

On July 11, 2007, the Commission issued an Order to Show Cause requesting that Visionary show cause why KSHK's and KNUQ's channels should not be changed to accommodate the above captioned minor change application filed by EMF. Visionary responded to the Commission's letter on August 10, 2007. In its letter, Visionary stated that it may not be able to change KSHK's channel because KSHK is multiplexed on its tower with three other stations and a combiner is used to combine the signals of these stations. Visionary also stated that it may not be able to change KNUQ's channel because it is unclear based on a recent decision whether the FCC will grant Visionary a permit for the new channel for KNUQ based on an alternate prediction method (Longley-Rice) to demonstrate coverage of its community of

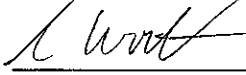
2007 SEP 12 P 1:58

license (Paauilo).¹ EMF in its Reply attempts to dismiss these concerns as trivial. They are not trivial. They are legitimate concerns that need to be addressed before KSHK and KNUQ are forced to change channels. If the Commission ultimately forces KSHK and KNUQ to change channels it should at the very least ensure that these stations can operate on these new channels.

Finally, EMF in its Reply also implies that Visionary is not cooperating with EMF. This is not true. Visionary has returned EMF's phone calls and has made its concerns clear to EMF. Visionary is willing to change channels as proposed by EMF but, as discussed, it wants to make sure that KSHK and KNUQ can operate on the new channels without any impact to its signal or coverage area.

Respectfully submitted,

VISIONARY RELATED ENTERTAINMENT, LLC

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September 11, 2007

Its Counsel

¹ Regarding KNUQ's Longley-Rice showing, EMF claims that the FCC's *Woodstock* exception applies. However, as stated in Visionary's August 10 letter, this is not clear based on the Commission's recent decision in *Ammon and Dubois, Idaho*, 20 FCC Rcd 10626 (2005) (FCC denied a channel change at site with no other technical changes because new channel did not provide city-grade coverage).

CERTIFICATE OF SERVICE

I, Elbert Ortiz, in the law firm of Wiley Rein LLP, do hereby certify that I have on this 11th day of September, 2007, unless otherwise noted, caused to be mailed by first class mail, postage prepaid, copies of the foregoing “**Reply**” to the following:

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* VIA HAND DELIVERY